#### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROBERT HINMAN and ITALIA FOODS, INC., an	)
Illinois corporation, individually and as the	) Case No.: 1:06-cv-01156
representatives of a class of similarly-situated persons,	) Case No.: 1:06-cv-01156
Plaintiffs,	Honorable Elaine E. Bucklo
v.	) Honorable Elaine E. Bucklo
	)
M and M RENTAL CENTER, INC., Defendant.	

#### **DECLARATION OF ROSS GOOD**

ROSS GOOD states the following under penalty of perjury:

- 1. I have personal knowledge of the facts and matters alleged herein and can competently testify to same.
- 2. I am an attorney with the law firm of Anderson + Wanca, located at 3701Algonquin Road, Suite 760, Rolling Meadows, IL 60008.
  - 3. I was given the responsibility of sending out class notice in this matter.
- 4. In the Court's order dated June 27, 2014 (Doc. 252), class notice by fax was to be done by July 3, 2014.
- 5. Attached as Exhibit A is a copy of the Class Notice; attached as Exhibit B is the list of the fax numbers provided to me.
- 6. I confirm that on or about July 3, 2014, I faxed Exhibit A to each of the 3,860 fax numbers listed in Exhibit B, for which 2,836 were successful and 1,024 failed. For each failed transmission, the fax broadcasting software attempted the transmissions at least three times.

Dated: September 22, 2014

**ROSS GOOD** 

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## **EXHIBIT A**

### THIS IS A NOTICE OF A LAWSUIT SETTLEMENT. You may benefit from this. Please read it carefully. You are not being sued.

#### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROBERT HINMAN and ITALIA FOODS, INC., an Illinois corporation, individually and as the representatives of a class of similarly-situated persons, Plaintiffs,	) Case No.: 1:06-cv-01156
class of similarly-situated persons, Flamilits,	) Honorable Elaine E. Bucklo
V.	)
M and M RENTAL CENTER, INC., Defendant.	)

#### NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

- TO: All persons who were sent, without permission, telephone facsimile messages of material advertising the commercial availability of any property, goods or services by or on behalf of Defendant during the period February 1, 2004 through June 23, 2005.
- A. WHY HAVE YOU RECEIVED THIS NOTICE? The Court ordered us to send you this Notice because you may be a member of the Class defined above. Your fax number was included on a list of fax numbers discovered in the litigation. This Notice explains the nature of the lawsuit and the settlement terms and informs you of your legal rights and obligations. If you are a member of the Class, you are eligible to claim a check for your share of the monetary benefits offered in this Settlement.
- B. WHAT IS THIS LAWSUIT ABOUT? This lawsuit is about advertisements defendant M and M Rental Center, Inc. ("Defendant") sent by fax from June 2002 through June 2005. On behalf of themselves and a class of similarly-situated persons, Plaintiffs alleged that Defendant violated the federal Telephone Consumer Protection Act, 47 U.S.C. § 227, by sending advertisements to the Class by fax without their prior express invitation or permission. In 2009, you were notified that the Court had certified a class and that the parties had reached a settlement that involved the entry of judgment against Defendant collectible only from its insurers. The insurers denied coverage and refused to pay all of the amounts claimed.

Now, one of the insurers, Maxum Indemnity Company ("Maxum"), has agreed to make \$2,005,754.57 available to settle claims regarding Defendant's fax ads that were sent during the period between February 1, 2004 and June 23, 2005. You were previously notified about the fact that one of Defendant's other insurers, First Specialty Ins., paid \$100,000 to settle claims about Defendant's fax ads that were sent between February 1, 2005 and February 1, 2006, and that money is part of the settlement funds available for distribution now. Plaintiffs continue to litigate against Defendant's other insurer, Security Insurance Company of Hartford, to collect the portions of the judgment for Defendant's fax ads sent in June 2002, September 2003, and November 2003.

C. WHAT IS THE PROPOSED SETTLEMENT? Without admitting any fault or liability, Maxum has agreed to send a monetary payment to each person who submits a timely and valid Proof of Claim. The monetary payment to each of the class members who submits a timely and valid Proof of Claim will correspond to the claimant's pro rata share of a \$2,105,754.57 Settlement Fund, up to \$533.90 per claimant. The Court has preliminarily approved this settlement, subject to a final fairness hearing that will occur on October 3, 2014, at 1:30 p.m., in Room 2243 of the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604.

#### D. WHAT ARE YOUR FOUR OPTIONS?

- 1. Return a completed claim form. To receive a share of the Settlement Fund, you must return a completed and signed Proof of Claim postmarked on or before August 18, 2014. The Proof of Claim is attached to this Notice. You may return it by fax or U.S. mail. If the Proof of Claim is timely and valid, you will receive a check for your share of the Settlement Fund at the address listed on the Proof of Claim. You will be bound by the judgment and you will release your claims against Maxum and Defendant relating to Defendant's fax ads sent during February 1, 2004 to June 23, 2005.
- 2. <u>Do nothing and receive nothing.</u> If you do nothing, you will remain a member of the class but you will not receive a share of the Settlement Fund. You will be bound by the judgment and you will release your claims against Maxum and Defendant relating to Defendant's fax ads sent during February 1, 2004 to June 23, 2005.
- 3. Exclude yourself from the Class and the settlement. You have the right to exclude yourself from the settlement by filing a written request for exclusion with the Clerk of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604. Your request for exclusion must be postmarked on or before August 18, 2014, and it must list your name, fax number(s), street address, and the name and number of this case. You must also mail copies of your request for exclusion, postmarked by the same date, to attorney Brian J. Wanca, Anderson + Wanca, 3701 Algonquin Road, Suite 760, Rolling Meadows, IL 60008, and to attorney Daniel J. Cunningham, Tressler, LLP, 233 S. Wacker Dr., 22nd Floor, Chicago, IL 60606-6308.
- 4. Object to the settlement in writing. If you object to the settlement, and wish to submit an objection rather than excluding yourself from the class action, you must submit your objection in writing to the Clerk of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604. Your objection must be postmarked by August 18, 2014. You must also serve copies of your objection and any supporting memoranda or materials on each of the attorneys for the Settlement Class and for Maxum, postmarked by the same date and addressed as follows:

For the Settlement Class:
Brian J. Wanca
Anderson + Wanca
3701 Algonquin Road, Suite 760
Rolling Meadows, IL 60008

For Maxum:
Daniel J. Cunningham
Tressler LLP
233 S. Wacker Dr., 22nd Fl.
Chicago, IL 60606-6308

Phillip A. Bock Bock & Hatch LLC 134 N. La Salle Ave., Suite 1000 Chicago, IL 60602

Any objection must include your name, fax number(s), and street address, the name and number of this case, and a statement of the reasons why you believe that the Court should find that the proposed settlement is not in the best interests of the Settlement Class. Please note that it is not sufficient to simply state that you object. You must state the reasons why you believe the settlement should not be approved. If you file an objection and wish it to be considered, you must also appear at the final approval hearing before Judge Elaine E. Bucklo in Room 2243 of the Everett McKinley Dirksen United States Courthouse on October 3, 2014 at 1:30 p.m. YOU ARE NOT REQUIRED TO ATTEND THIS HEARING UNLESS YOU PLAN TO OBJECT TO THE SETTLEMENT.

- E. WHEN WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT? The Court will hold a hearing on the fairness of the proposed settlement. At the fairness hearing, the Court will hear any objections and arguments concerning the fairness of the proposed settlement, including the amount of the award of costs and attorney's fees to Class Counsel. The fairness hearing will take place on October 3, 2014, at 1:30 p.m., in Room 2243 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. Unless you have objected to the settlement, you do not need to attend this hearing. The fairness hearing may be continued to a future date without further notice. If the Court does not approve the settlement, the case will proceed as if no settlement has been attempted. If the settlement is not approved, there is no assurance that the Class will recover more than is provided in the settlement or recover anything at all
- **F.** WHO REPRESENTS THE CLASS? Plaintiffs, Robert Hinman and Italia Foods, Inc. are the "Class Representatives," and the following attorneys are "Class Counsel":

Brian J. Wanca Anderson + Wanca 3701 Algonquin Road, Suite 760 Rolling Meadows, IL 60008 Phillip A. Bock Bock & Hatch LLC 134 N. La Salle Ave., Suite 1000 Chicago, IL 60602

At the fairness hearing, Class Counsel will request that the Court order from the Settlement Fund payment of incentive awards of \$15,000 each to Robert Hinman and Italia Foods, Inc. for their services on behalf of the Settlement Class. Additionally, Class Counsel will request an award of attorneys' fees equal to one third of the Settlement Fund plus out-of-pocket litigation expenses, all to be paid to them from the Settlement Fund, for their work on behalf of the Class.

G. HOW DO I OBTAIN MORE INFORMATION ABOUT THE LAWSUIT OR THE SETTLEMENT? This description of the case is general and does not cover all of the issues and proceedings. To see the complete file, including a copy of the settlement agreement, you may visit the office of the Clerk of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604. The Clerk will make the files relating to the lawsuit available to you for inspection and copying at your own expense.

If you have specific questions, you can write to Class Counsel at one of the addresses listed above. Include the case number, your name, your fax number, and your current street address on any correspondence. You may also call attorney Anderson + Wanca at 855-827-2329, or you can call Bock & Hatch, LLC at 312-658-5501. Please do not contact the Clerk of the Court, the judge, or the judge's staff, because they cannot answer questions about this settlement or give you advice.

BY ORDER OF THE COURT HONORABLE ELAINE E. BUCKLO

## Case: 1:06-cv-01156 Document #: 260-2 Filed: 09/30/14 Page 6 of 25 PageID #:6346 PROOF OF CLAIM

Robert Hinman and Italia Foods, Inc. v. M and M Rental, Inc., Case No. 1:06-cv-01156 Maxum Indemnity Company v. Eclipse Mfg. Co., 06 C 4946, Appeal No. 14-1046

Fax Number: <mergefax#>

You Must Complete All FOUR Steps to Claim a Share of the Settlement Fund:

1.	<u>You</u>	Must Provide Your Contact Information.
		Name:
		Company:
		Address:
		City/State/Zip Code:
		Fax Number(s):
2.	<u>You</u> Forn	Must Verify Ownership of the Fax Number of the Machine that Received this Claim
	a.	"The fax number at which I received this Proof of Claim was assigned to me or my compan throughout the period February 1, 2004 through June 23, 2005."
		(Sign your name here)
	<u>OR</u> b.	"The fax number at which you received this Proof of Claim was <b>not</b> assigned to you or you company throughout the period February 1, 2004 through June 23, 2005." Explain when you obtained the fax number:
		(Sign your name here)
3.		Must Verify That You Did Not Provide Express Permission or Invitation to M and M all Center
		"I did not provide prior express permission or invitation to M and M Rental Center to send me facsimile advertisements."
		(Sign your name here)
4.	<u>You</u>	Must Return this Claim Form by August 18, 2014:
		a. Fax this Claim Form to: (855) 827-2329

Anderson + Wanca c/o HvM Claims 3701 Algonquin Road, Suite 760 Rolling Meadows, IL 60008

Mail this Claim Form to:

b.

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# **EXHIBIT B**

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